



REPLY TO:
LIMETREE BAY TERMINALS, LLC
1 Estate Hope
Christiansted VI 00820-5652

August 16, 2019

**CERTIFIED MAIL NO. 7017 3380 0000 5497 6965
RETURN RECEIPT REQUESTED**

Ms. Kathlyn P. Worrell-George, Acting Director
Division of Environmental Protection
Department of Planning & Natural Resources
45 Mars Hill
Frederiksted, St. Croix, V.I. 00840-4474

**Subject: Title V Permit No. STX-TV-003-10 Six Month Deviation Report –
January 1, 2019 through June 30, 2019**

Dear Ms. Worrell-George:

Limetree Bay Terminals, LLC (Limetree Bay Terminals) is submitting this report in accordance with Section 8.13.1 of the above referenced Title V Permit. The permit was issued to HOVENSA, L.L.C. by VIDPNR on July 1, 2010 and was transferred to Limetree Bay Terminals on March 9, 2016. This report addresses all deviations from required monitoring as specified by the permit. The deviations and associated information are presented in table format in the enclosed Attachment A.

Additionally, the 6 month compliance schedule progress report is included as Attachment B. The progress report covers those compliance schedules that remain incomplete. However, Limetree Bay Terminals was in compliance during this semi-annual period with the applicable requirements of the Title V permit referenced in these compliance schedules because of refinery idling. The certification by a responsible official required by Section 8.8.2 is enclosed as Attachment C.

If you have any questions or comments regarding this report, please contact Catherine Elizee at (340) 692-3073.

Sincerely,

Darius Sweet
CEO

DS/CE/sm
Attachments
Cc: Verline Marcellin w/attachments

Title V - Attachment A

6-Month Deviation Report: January - June 2019

Description of Deviation	Permit Condition No.	Permit Condition	Plant Area	Process Unit	Source ID (from TV Permit Table 1)	Deviation times and duration
NONE						

Attachment B

Title V Six Month Compliance Schedule Progress Report Update - Deviation Status Report Out
Please note that all refinery specific processing units were idled during the first quarter of 2012.

TV Schedule ⁽¹⁾	Project	Corrective Action	Construction Completion	Full Compliance	Status	Progress to Date
No. 2	Coke handling Vents	Submit coker application update	6/30/2008 ⁽²⁾	Effective date of new coker permit	Open	Permit application revision submitted 6-30-2008. Unit currently idle.
No. 4	Boilers 5, 8 & 9 Subpart D compliance	Install equipment necessary to comply with Subpart D requirements	7/31/2012	7/31/2012	Open	Project is on hold since the refinery is now idle.
No. 6	GT's 1-9 NO _x , O ₂ CEMS NSPS GG Compliance	Install CEMS, comply with GG standards	6/7/2016 ⁽³⁾	6/7/2016 ⁽³⁾	Open	All GTs are idle, except for GTs 4, 7 & 8. Stack test performed in May 2016 and Nov. 2018 proved compliance with GG at current Terminal only operation. On February 28, 2017, Limetree Bay Terminals submitted a Title V Minor Modification request to DPNR to permanently shutdown GTs 1, 2, 3, and 6.
No. 8	NSPS NNN	Submit AMP	Dependent on AMP approval	Dependent on AMP approval	Open	Waiting on AMP approval. Affected source now idle.
No. 14	LSF Application	Submit revised modeling in revised coker permit application	Date EPA approves revised modeling	Date EPA approves revised modeling	Open	A revised modeling was submitted to EPA in November 2009 as part of the SO ₂ Reduction/Replacement Boilers Project PSD permit application. Since the refinery is now idle, the application is on hold.
No. 16	Penex compressor engines and 5 DD 40 CFR 63 Subpart ZZZZ	Add pressure monitoring device and thermocouple on catalyst beds	6/3/2013	12/3/2013	Open	Project is on hold since the refinery is now idle.
No. 17	Used oil permit update	Include language in TV permit approving used oil burning	Date dependent on the date that a new permit is issued by DPNR	Date dependent on the date that a new permit is issued by DPNR	Open	Since the refinery is now idle, Limetree Bay Terminals can not accept used oil.

⁽¹⁾ See Title V application submitted 12/14/07 / Update No. 1 submitted 6/13/08, Update No. 2 Submitted 10/10/08, Update No. 3 Submitted 12/31/09 and renewal application submitted 12/19/14

⁽²⁾ Date of submittal of coker permit application update and resubmitted under GT NO_x Reduction Project Permit Application 8/14/09

⁽³⁾ Five years from consent decree date of entry

LIMETREE BAY TERMINALS, LLC

ATTACHMENT C – Certification by Responsible Official of Attachments A and B

Title V Six Month Deviation Report

For the Period
January 1, 2019 – June 30, 2019

Based upon information and belief formed after reasonable inquiry, I certify that the statements and information contained in Attachments A and B are true, accurate, and complete.



Darius Sweet
CEO



Date

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